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14 *Attorneys for Defendant Transworld Systems Inc.*

15 UNITED STATES DISTRICT COURT

16  
17 DISTRICT OF NEVADA

18 Richard Klein, *et al.*, ) Case No. 2:22-cv-01392-GMN-BNW  
19 )  
20 Plaintiffs, ) **STIPULATION AND ORDER**  
vs. ) **EXTENDING DEADLINE TO**  
21 ) **FILE REPLY MEMORANDA IN**  
22 ) **SUPPORT OF TSI'S AND TRUST**  
23 National Collegiate Student Loan Trust ) **DEFENDANTS' MOTIONS TO**  
24 2005-3, *et al.*, ) **DISMISS**  
25 Defendants. ) (First Request)  
26 )  
27 / / /  
28 / / /

## **STIPULATION**

Plaintiffs, Richard Klein, Raymond Urias and Sandra J. Gunter (“Plaintiffs”), and Defendants, Transworld Systems Inc. (“TSI”), National Collegiate Student Loan Trust (“NCSLT”) 2005-3, NCSLT 2006-3, NCSLT 2007-1, NCSLT 2007-2, and NCSLT 2007-3, and NCSLT 2007-4 (the “Trust Defendants” and, with Plaintiffs and TSI, the “Parties”), by and through their undersigned counsel, hereby jointly stipulate, agree, and move as follows:

1. On March 8, 2023, TSI and the Trust Defendants filed Motions to Dismiss Plaintiffs' First Amended Complaint (the "Motions to Dismiss"). ECF Nos. 39, 40.

2. On April 19, 2023, Plaintiffs filed their Oppositions to the Motions to Dismiss. ECF Nos. 56, 57.

3. Pursuant to LR 7-2, TSI's and the Trust Defendants' reply memoranda are currently due to be filed on April 26, 2023.

4. Due to personal and familial obligations, counsel for TSI and the Trust Defendants require additional time to prepare and file their reply memoranda in support of the Motions to Dismiss.

5. The Parties have conferred and agreed that TSI and the Trust Defendants shall have up to and including May 10, 2023, to file their reply memoranda in support of the Motions to Dismiss.

6. This is the first requested extension by TSI and the Trust Defendants for these filings, which will neither prejudice any party nor unreasonably delay the litigation.

IT IS SO STIPULATED this 20th day of April, 2023.

FREEDOM LAW FIRM

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18 and on behalf of all others similarly  
19 situated

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### *Attorneys for the Trust Defendants*

## **ORDER**

Pursuant to the Parties' stipulation, IT IS HEREBY ORDERED:

TSI and the Trust Defendants shall have up to and including May 10, 2023, to file reply memoranda in support of their Motions to Dismiss (ECF Nos. 39, 40).

## IT IS SO ORDERED:

**UNITED STATES DISTRICT JUDGE**

DATED: April 21, 2023